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10 Attorneys for Plaintiff
FACEBOOK, INC.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION
15

16 FACEBOOK, INC.,

17 Plaintiff,

18 v.
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20 POWER VENTURES, INC., a Cayman Island
corporation; STEVE VACHANI, an individual;
21 DOE 1, d/b/a POWER.COM, DOES 2-25,
inclusive,

22 Defendants.
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Case No. 5:08-cv-05780 LHK

**DECLARATION OF I. NEEL
CHATTERJEE IN SUPPORT OF
FACEBOOK'S ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF
SUPPORTING MATERIALS**

Dept: Courtroom 8, 4th Floor
Judge: Hon. Judge Lucy H. Koh

1 I, I. Neel Chatterjee, declare as follows:

2 1. I am an attorney with the law firm of Goodwin Procter LLP (“Goodwin”), counsel of
3 record to Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good
4 standing of the Bar of the States of California. I make this declaration based on my personal
5 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set
6 forth herein.

7 2. Facebook seeks permission to file under seal information reflecting outside counsel
8 Goodwin’s confidential billing and rate-setting practices. Facebook and Goodwin have a business
9 need to maintain confidentiality for this material, as such business information is commercially
10 sensitive and not publically known and could prejudice Facebook and its outside counsel in future
11 negotiation.

12 I declare under penalty of perjury that the foregoing is true and correct to the best of my
13 knowledge. Executed this 3rd day of August, 2017 in Menlo Park, California.

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15 /s/ I. Neel Chatterjee
16 I. Neel Chatterjee
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